



# Oregon

John A. Kitzhaber, M.D., Governor

## Department of Environmental Quality

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December 21, 2000

Eric J. Conard, REA  
GATX Terminals Corporation  
1363 North Gaffey Street  
San Pedro, CA 90731-1323



RE: Review of RI Proposal for GATX – Linnton Terminal

Dear Mr. Conard:

The Department of Environmental Quality's (DEQ) Voluntary Cleanup and Portland Harbor Program has completed a review of the Remedial Investigation (RI) Proposal for the GATX Linnton Terminal at 11400 NW St. Helens Road in Portland, OR submitted on your behalf by KHM Environmental Management, Inc. In general the document accurately describes the site background and presents a good starting framework for the questions that need to be answered. Several items that the Department feels are important to include in the Remedial Investigation are discussed below. The RI Proposal does not need to be resubmitted if the following are incorporated into the RI Work Plan.

### Potential Sources of Contaminants

The RI Work Plan should itemize source areas that have been investigated (and indicate whether or not characterization has been completed), and potential source areas that have not been investigated.

### Potential Migration Pathways

As a bridge between Potential Release Mechanisms section and Potential Migration Pathways, there should be a list of the Chemicals of Concern (COCs) and the media that are known or suspected to be impacted. These can be itemized in the RI Work Plan.

Observations of sheens at the riverbank have been noted in the past after upland releases. This, combined with the fact that the 0-90 cm sediment sample showed elevated PAHs and SVOCs, raises questions about the containment capabilities of the bulkheads. The Department will not consider the bulkheads to be barriers until their ability to restrict contaminant transport is evaluated. The RI Work Plan should identify this as a pathway that needs to be evaluated.

Although the stormwater collection and treatment system may be operating within established permit limits, this pathway represents a possible source of past and/or current contamination to sediments in the Portland Harbor. As such, this would be considered a pathway of concern that needs to be evaluated at the GATX facility during the Remedial Investigation.



### Potential Ecological Receptors

A Level I Scoping Ecological Risk Assessment should be completed to document terrestrial habitat (or the lack of it) at the GATX facility, and to document the need for further evaluation of the aquatic habitat in the Willamette River which will be conducted by others. The RI proposal should identify whether a Level I Scoping and/or Level II Screening Ecological Risk Assessment will be submitted as a separate deliverable, or as a part of the supporting documentation in the RI Work Plan.

### Objectives of RI Activities

One of the primary objectives of the RI should be to evaluate if onsite contaminants are currently migrating off site to the Willamette River/sediments. While the upland RI does not need to fully characterize the nature and extent of sediment contamination, some tool must be used to document whether GATX is a current source of sediment contamination. The methods used to make this determination (which could include some combination of sediment, pore-water, and/or catch basin sampling) should focus on potential migration pathways, and should be detailed in the RI Work Plan.

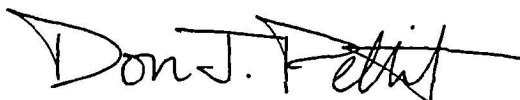
### Miscellaneous

Some documents on file reference a "containment barrier" installed in the 1960s to collect product via a slotted pipe. Information on the need for this feature, its function, and its current status, and more recent free-product recovery efforts, should be presented in the RI Work Plan as a basis for understanding what source controls may be necessary.

Information on maintenance dredging events should be included in the RI Work plan. Of particular importance are the dates and locations of recent dredging events, the disposition of dredged materials, and whether any dredging events are planned in the near future.

Please include these comments in the draft RI Work Plan for the GATX Linnton Terminal, which according to the schedule established in the Voluntary Agreement – Attachment B, should be submitted to the Department by February 15, 2001. If you have any questions or concerns, or would like to discuss these issues prior to submission of the RI Work Plan, please contact me at (503) 229-5492.

Sincerely,



Don J. Pettit, R.G.  
Voluntary Cleanup and Portland Harbor Section  
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